

JAMES R. FROCCARO, JR.  
Attorney at Law  
20 Vandeventer Avenue, Suite 103W  
Port Washington, NY 11050  
telephone: (516) 944-5062  
fax: (516) 944-5066  
email: [JRFESQ61@aol.com](mailto:JRFESQ61@aol.com)

July 16, 2012

BY ECF & REGULAR U.S. MAIL

Hon. Dora L. Irizarry  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Lance Schoner  
11 Cr 486 (DLI)

Dear Judge Irizzary:

On August 3, 2011, Mr. Schoner was released on bail in this matter on a \$5 million Appearance Bond with among other conditions, that he be placed on house arrest with an electronic monitoring bracelet equipped with "GPS" tracking. He is presently permitted to leave his residence in the State of New Jersey to work full-time, for medical emergencies, attorney visits and court appearances. Mr. Schoner has at all times been compliant with the terms of his release.

As Your Honor is aware, during the pendency of this case, Mr. Schoner's wife gave birth to a baby girl. The Schoner's daughter will be celebrating her first birthday in early August with a party at the Schoner's parents (the child's fraternal grandparents) residence located at 7 Logan Lane, in Manalapan, New Jersey. The grandparents, Robert and Penni Schoner, are suretors on Mr. Schoner's Bond.

By this letter, I am respectfully requesting that Mr. Schoner be granted permission to stay at his parents home on August 4 and August 5, 2012, from 10:00 a.m. until midnight each day. He will be at his parents home on August 4<sup>th</sup> to set up the premises for his daughter's party, and on August 5<sup>th</sup> he will be there to attend the party, along with family and friends.

The government and U.S. Pretrial Services Office have both consented this request.

Respectfully submitted,

/JRF/

James R. Froccaro, Jr.

JRF:tp